IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CITIZENS INSURANCE COMPANY OF

AMERICA A/S/O GOLDEN VALLEY : CIVIL ACTION

MANAGEMENT, INC.

Plaintiff

v.

CASE NO: 1:21-cv-04201

JAAP TRUCKING, INC.

: NOTICE OF MOTION FOR Defendant : **DEFAULT JUDGMENT**

NOTICE OF MOTION FOR DEFAULT JUDGMENT

PLEASE TAKE NOTICE that, on December 20, 2023, at 11:00 am, upon the accompanying Affidavit of Vlad Kushnir, Esq., and all Exhibits thereto, the Plaintiff will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for a default judgment order against the Defendant.

RESPECTFULLY SUBMITTED,

Date: 11/20/2023 By: /S/ VKushnir

Vlad Kushnir, Esq. Bar ID # 90571 VB Kushnir, LLC 5 Neshaminy Interplex Suite 205

Trevose, PA 19053 P: 800-673-1770 F: 888-470-2704 vk@vbklaw.com Attorney for Plaintiff

In addition to the topics outlined in the Court's previous Order concerning Plaintiff's motion for default judgment, Dkt. 60, Plaintiff should also be prepared to discuss its freight cost calculations at tomorrow's telephonic hearing.

SO ORDERED.

Date: December 19, 2023 New York, New York

JOHN P. CRONAN United States District Judge